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Attorney for Plaintiffs and Counterclaim Defendant Saipan Handicraft

**IN THE UNITED STATES DISTRICT COURT
FOR THE
THE NORTHERN MARIANA ISLANDS**

SAIPAN HANDICRAFT,)	CIVIL ACTION No. 05-0040
)	
Plaintiff)	
)	
v.)	
)	PLAINTIFFS' PROPOSED
MICRONESIA WOODCRAFT, ENT., INC.,)	CASE MANAGEMENT
ET AL)	STATEMENT
)	
Defendants.)	
_____)	

Comes now plaintiffs who submit the following proposed Case
Management Conference Statement:

(a) Service of Process:

All parties have been properly served.

(b) Jurisdiction and Venue:

Subject matter Jurisdiction and venue is proper.

(c) Track Assignment:

Complex. Complex assignment is appropriate for this case as it involve various claims of trademark rights and infringements arising from a locally produced product. Additionally, there are related proceedings in the United States Patent and Trademark Office (USTPO) and the Trademark Trial and Appeals Board (TTAB).

(d) Anticipated motions:

The motions defendants anticipate filing include, but are not limited to the following:

1. Motion to amend complaint;
2. Discovery motions;
3. Summary judgment motions.

(e) Anticipated Discovery and Limitation on Discovery:

1. Interrogatories will be served upon by each defendant.
2. A request for Production of Documents will be served upon each defendant.
3. A Request for Admissions will be served upon each defendant.
3. Defendants anticipates deposing each defendant as well as taking fact

depositions.

(f) Further proceedings:

Plaintiff leaves the setting of the proceedings to the court.

(g) Special Procedures:

Not necessary.

(h) Modification of the standard pre-trial procedures:

There may be some modifications required given the existence of related administrative proceedings.

(i) Settlement prospects:

Plaintiffs are always open to reasonable settlement.

(j) Limitation of issues:

No limitation is necessary, at this time.

(k) Setting of dates:

Plaintiffs agree with the trial date in early November as suggested by defendants LK Corporation and Lee Byung Deuk. However, since the November 7, 2008 trial date suggested by defendants LK Corporation and Lee Byung Deuk is a Friday, plaintiffs suggest the following schedule based on a November 10, 2008 trial date:

1. Motions to amend and supplement pleadings filed on or before February 15, 2008;
2. Settlement/Status Conference May 16, 2008;
3. All discovery served so as to be completed by August 15, 2008;
4. Discovery motions filed on or before August 22, 2008;
5. All dispositive motions heard on or before October 9, 2008;
6. Final Settlement Conference October 10, 2008
7. Joint pre-trial order October 24, 2008
6. Final Pre-trial conference November 5, 2008; and
4. Trial date of November 10, 2008 at 9:00 a.m.

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By: _____/s/_____
G. Anthony Long

